

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

## ALL ACTIONS

**MOTION FOR ORDER TO SHOW CAUSE**

BrownGreer PLC, the Court-appointed Claims Administrator of the Settlement Program established under the Class Action Settlement Agreement approved by this Court files this Motion for Order to Show Cause, moving for entry of an Order, in the form submitted with this Motion, directing that lawyer Richard B. Collins to appear before the Court and show cause as to why he should not be found in civil contempt and sanctioned for filing a “Complaint for Temporary and Permanent Injunction” on behalf of his law firm, Collins & Truett, P.A., in the Circuit Court of the Second Judicial Circuit, in and for Leon County, Florida, against the Special Masters appointed by the Court, Roma Petkauskas, BrownGreer, and others involved in the administration of the Settlement Agreement, in violation of Paragraph 16 of the April 22, 2015 Final Order and Judgment of the Court approving that Agreement (Document 6510). In that Order, this Court ruled that it has continuing and exclusive jurisdiction over all Settlement Class Members and any dispute or controversy arising out of or related to the interpretation, implementation, administration, or enforcement of the Settlement Agreement.

WHEREFORE, on the grounds presented in the following Memorandum in Support, and in light of the facts set out in the Declaration of Orran L. Brown, Sr., and its exhibits attached as Attachment A to the Memorandum, BrownGreer prays that Richard B. Collins be directed to appear before this Court and show cause why he should not be found in civil contempt of this Court's Order and sanctioned, that he be ordered not to pursue any proceedings in the Florida suit during the pendency of this show cause matter, and for such other and further relief as the Court may deem appropriate.

Respectfully submitted,

**CLAIMS ADMINISTRATOR**

By:           /s/ Oran L. Brown            
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Memorandum in Support of Motion for Order to Show Cause was served on all counsel of record through the Court's ECF system and by electronic mail, on this 6<sup>th</sup> day of July, 2021 upon the following:

Richard B. Collins, Esquire  
Collins & Truett Attorney, P.A.  
113 South Monroe Street  
Tallahassee, Florida 32301

/s/ Orran L. Brown

Orran L. Brown